

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

TERIANA JONES and BETHANY MORRISSEY,
on behalf of themselves and a class of employees
and/or former employees, similarly situated,

Plaintiffs,

v.

Case No. 17 cv 125

CRUISIN' CHUBBYS GENTLEMEN'S CLUB, et al.,

Defendants.

PLAINTIFFS' COUNSEL PETITION FOR FEES

NOW COME THE PLAINTIFFS, Teriana Jones and Bethany Morrissey, on behalf of themselves and those similarly situated, by and through their attorneys, Gingras, Cates & Wachs, and Moen Sheehan Meyer, LTD, and respectfully petition the Court for an award of costs and attorneys' fees as set forth below.

1. Class counsel have negotiated the settlement of this FLSA collective action and Rule 23 class action on that includes approximately 109 individuals.
2. Class counsel from both firms have participated in the litigation and resolution of numerous class action cases in the past.
3. The total settlement amount is \$400,000.00. As of the date of this Petition, Plaintiffs' counsel have incurred actual attorney fees in the amount of \$256,647 for 798.7 hours of work performed from the commencement of this case. The firms have incurred costs in the amount of \$4,366.04.

4. Under the terms of the fee agreements that exist between executed between Class Counsel and the Named Plaintiffs, Class Counsel is entitled to one-third of the common fund, plus out of pocket expenses. Class Counsel petitions the Court for an award of \$137,699.37, \$133,333.33 in attorney fees and the remainder for out of pocket expenses.

5. The requested award is consistent with the market rate for similar cases in the Madison, Wisconsin market.

WHEREFORE, Plaintiffs respectfully request that the Court award costs and attorneys' fees as set forth above.

Dated this 8th day of October, 2018.

GINGRAS CATES & WACHS LLP
Attorneys for Plaintiffs

s/ Paul A. Kinne

Paul A. Kinne

State Bar Number: 1021493

1850 Excelsior Drive
Madison, WI 53717
Phone: (608) 833-2632
Fax: (608) 833-2874
Email: kinne@gcwlawyers.com

s/ Kara M. Burgos

Kara M. Burgos

State Bar No. 1020960

201 Main Street, Suite 700
La Crosse, WI 54602-0786
Tel: (608) 784-8310
Fax: (608) 782-6611
Email: kburgos@msm-law.com